

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SUPER INTERCONNECT
TECHNOLOGIES LLC,

Plaintiff,

vs.

GOOGLE LLC,

Defendant.

Civil Action No. 6:21-cv-259-ADA

JURY TRIAL DEMANDED

**DECLARATION OF ANDRE GOLUEKE REGARDING GOOGLE LLC'S MOTION TO
TRANSFER VENUE TO THE NORTHERN DISTRICT OF CALIFORNIA**

I, Andre Golueke, declare and state as follows:

1. I am a Discovery Manager on the Discovery Legal team at Google LLC (“Google”). I have been a Google employee since 2011. My office is in [REDACTED] California.

2. I provide this declaration in support of Google LLC’s Motion to Transfer Under 28 U.S.C. § 1404(a), which seeks to transfer the above-captioned action filed by Super Interconnect Technologies LLC (“SIT”) on March 15, 2021. I am over 18 years of age and have personal knowledge of the facts set forth in this Declaration. If called as a witness, I could and would testify competently to the information contained herein.

3. Google’s Mountain View headquarters, which includes offices in neighboring Sunnyvale (collectively referred to as “Mountain View”), is the strategic center of Google’s business. On March 15, 2021, the Mountain View headquarters employed approximately [REDACTED] employees, which is approximately [REDACTED] % of Google’s U.S. employees. As of March 15, 2021, Google also had approximately [REDACTED] other employees in offices in San Francisco, California and other smaller offices also within the Northern District of California. As of March 15, 2021, approximately [REDACTED] % of Google’s [REDACTED] total U.S. employees, including engineers, product managers, marketers, executives, and staff were employed out of Google’s offices located in the Northern District of California.

4. I understand that the Plaintiff accuses certain Google Pixel series smartphones (hereinafter, “Pixel Products”), and in particular their Universal Flash Storage (UFS) capabilities, as allegedly infringing.

5. Based on my knowledge and investigation, the Google employees who have knowledge about the technical, financial, and marketing aspects of the accused Pixel Products

live and work in the San Francisco Bay Area. In particular, the engineers and groups with knowledge relating to the accused Universal Flash Storage (UFS) interfaces in the accused Pixel Products live and work in or near Mountain View.

6. Based on my knowledge and investigation, Michael Diamond is a staff hardware engineer at Google and works as the engineering manager of the Mountain View-based system integration team for accused Pixel Products. I understand that Mr. Diamond [REDACTED] [REDACTED] works at Google's Mountain View headquarters. I understand that Mr. Diamond has knowledge regarding technical aspects of accused Pixel Products, including their circuit board design and UFS interfaces.

7. Based on my knowledge and investigation, Madhav Chitlu is a memory commodity and supply manager working at Google. I understand that Mr. Chitlu [REDACTED] [REDACTED] works at Google's Mountain View headquarters. I understand that Mr. Chitlu has knowledge regarding Google's business relationship with suppliers of memory and storage components for the accused Pixel Products.

8. Based on my knowledge and investigation, the marketing efforts for the accused Pixel Products are also managed by employees located at Google's Mountain View headquarters.

9. Based on my knowledge and investigation, Abhijit Ravi is Google's Head of Product Marketing for Pixel phones. I understand that Mr. Ravi [REDACTED] [REDACTED] works at Google's Mountain View headquarters. I understand that Mr. Ravi has knowledge about marketing, promotion, and business information regarding the accused Pixel Products.

10. Based on my knowledge and investigation, Nick Yoswa is a senior financial analyst in the Pixel business unit. I understand that Mr. Yoswa [REDACTED]

[REDACTED] works at Google's Mountain View headquarters. I understand that Mr. Yoswa has knowledge regarding financial data and statements, accounting, and record-keeping related to the accused Pixel Products.

11. Based on my knowledge and investigation, James Maccoun is a patent counsel at Google. I understand that Mr. Maccoun [REDACTED] works at Google's Mountain View headquarters. I understand that Mr. Maccoun has knowledge regarding Google's license agreements and licensing practices.

12. Based on my knowledge and investigation, I am not aware of any Google employees with relevant technical, marketing, or financial knowledge regarding the accused Pixel Products who reside or work in the Western District of Texas, including in Google's offices in Austin, or anywhere else in Texas.

13. As a matter of Google practice, documents in Google's possession about its products and services are normally created and maintained by the employees working on those products and services. As discussed above, the employees with relevant knowledge of the accused features of the Pixel Products are located primarily in or around Mountain View, California, and no such employees are in the Western District of Texas.

I declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct. Executed on April 22, 2021, in [REDACTED]

Andre Golueke
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